

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>South of Palermo 115 kV Reinforcement Project</p> <p>Compliance Status Report: 16</p> <p>October 31, 2019</p>

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Initial Study (FIS)/Mitigated Negative Declaration (MND) for the South of Palermo 115 kV Reinforcement Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FIS/MND to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities on the project, a summary of site inspections conducted by the CPUC’s third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. Photos of site observations are included in Attachment A of this report. Summaries of the Notices to Proceed (NTP) and Minor Project Refinements (MPR) are provided in Attachments B and C, respectively.

This compliance status report covers construction activities from October 1 through October 31, 2019.

CONSTRUCTION SCHEDULE AND PROGRESS

PG&E began construction activities associated with NTP-1 on July 1, 2018. Additional construction activities associated with NTP-2 were started concurrently on September 6, 2018. Construction of additional project elements associated with NTP-3 were started on March 27, 2019. All project activities are scheduled to be complete by the end of 2021.

Tower crews continued to install foundations on the South of Palermo line, remove old towers/poles, and install the steel middle and upper sections of the transmission towers. Transmission line crews continued to install switches and began transferring existing conductors to the newly installed towers. Civil crews continued to perform winterization work to prepare all-weather locations on the South of Palermo line.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party EM conducted site observations in areas under active construction. Areas of active and inactive construction were observed to verify implementation of the mitigation measures stipulated in the project's MMCRP. Observations were documented using site inspection forms and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

Activities observed during this period included guard structure installation, work site winterization, reconductoring work, installation of tower tops (see Photo 1) and bases, work site staging and preparation for pulling, and tower removal. During this reporting period, the CPUC EM also observed the temporary storage of removed tower structures at Landing Zone (LZ) 4/31 (see Photo 2). The EM verified that these structures are planned for removal prior to the start of nesting bird season.

Sensitive resource area signs were observed to be clearly posted in accordance with APM BIO-3, including signs to identify elderberry bushes for avoidance in accordance with APM BIO-8 and signs to identify vernal pool features for avoidance in accordance with APM BIO-12 (see Photo 3). The CPUC EM verified that ground disturbance activities near vernal pool features were completed prior to October 15 per APM BIO-6.

Storm Water Pollution Prevention Plan (SWPPP) Best Management Practices (BMPs) such as silt fencing and wattles were inspected and repairs were made or scheduled in accordance with APM HYDRO-1.

The CPUC EM observed signage installed to provide fugitive dust inquiry information to the public in accordance with APM AQ-2 (see Photo 4).

The CPUC EM also verified that preconstruction surveys and construction monitoring for the giant garter snake (GGS) were conducted in work areas and access roads with appropriate habitat, as required by APM BIO-9.

Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking table. A complete list of mitigation measures and applicant proposed measures is included in the FIS/MND in the Decision for the Power Line Reinforcement Project, as adopted by the CPUC on May 16, 2018 (Decision 18-05-014) and the MMCRP.

Compliance Status

One Level 1 minor deviation was observed on October 1, 2019. Despite water trucks being used, very dry conditions for work occurring on very fine, powdery soil resulted in excessive fugitive dust. The issue was quickly resolved with additional water spraying on the work site.

ATTACHMENT A Photos



Photo 1: Crews were observed installing a new tower top structure at Pole 25/184.

ATTACHMENT A (Continued)



Photo 2: Removed tower structures are temporarily stored at LZ 4/31. The structures are planned for removal prior to the start of nesting bird season.

ATTACHMENT A (Continued)



Photo 3: Sensitive vernal pool habitat resources were marked clearly with signage and avoided in accordance with APM BIO-3.

ATTACHMENT A (Continued)



Photo 4: Signage installed to provide fugitive dust inquiry information to the public in accordance with APM AQ-2.

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC - 001	June 14, 2018	Construction activities at select locations along the Bogue Sub-Line Segment, the Pease Sub-Line Segment, and the South of Palermo Line.	Y
CPUC - 002	September 6, 2018	Construction activities which would take place concurrently with work covered under NTP-1 at select locations along the Bogue Sub Line Segment, the Pease Sub Line Segment, and the South of Palermo Line.	Y
CPUC - 003	March 27, 2019	Construction activities at select locations along the Rio Oso Sub Segment, the Pease Sub Line Segment, and the South of Palermo Line.	Y

ATTACHMENT C

Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
001	July 09, 2018	Requested to add an approximately 400-by-600 foot landing zone/pull site along the Pease Sub-Line Segment and also the relocation of an approximately 200-by-200 foot landing zone along the Bogue Sub-Line Segment.	Approved	07/19/18